

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

| to this address. | o r omioyirama i | .vonao, | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | | |
|---|--|---------------------------------|--|--|--|--|
| Certification wit | h Respect to | Citatio | n of Data | | | |
| Applicant's/Registrant's Name, Address, and Telephone Number Consus Chemicals, LLC c/o Pyxis Regulatory Consulting, St. Ct. NW, Gig Harbor, WA (253) 853-7369 | Inc. 4110 136 | ith | EPA Registration Number/File Symbol/ 86828- | | | |
| Active Ingredient(s) and/or representative test compound(s) Glufosinate-ammonium | | | Date May. 01, 2018 | | | |
| General Use Pattern(s) (list all those claimed for this product using 40 C TGAI | FR Part 158) | | Product Name Consus Glufosinate Technical | | | |
| NOTE: If your product is a 100% repackaging of another purchased submit this form. You must submit the Formulator's Exemption Statemer | EPA-registered potents (EPA Form 8 | roduct 70-27). | labeled for all the same uses on your label, you do not need to | | | |
| I am responding to a Data-Call-In Notice, and have includin should be used for this purpose). | g with this form a | list of o | companies send offer of compensation (the Data Matrix form | | | |
| SECTION I: METHOD OF | DATA SUPPOR | Γ (Chec | k one method only) | | | |
| I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). I am using the selective method of support (or cite-al under the selective method), and have included with completed list of data requirements (the Data Matrix be used). | | | | | | |
| SECTION II: | SECTION II: GENERAL OFFER TO PAY | | | | | |
| [Required if using the cite-all method or when using the cite-all option un | der the selective | method | to satisfy one or more data requirements] | | | |
| I hereby offer and agree to pay compensation, to other pers | ons, with regard | to the a | pproval of this application, to the extent required by FIFRA. | | | |
| SECTION | ON III: CERTIFIC | ATION | | | | |
| I certify that this application for registration, this form for reregi application for registration, the form for reregistration, or the Data-Call-In indicated in Section I, this application is supported by all data in the Ager substantially similar product, or one or more of the ingredients in this pro requirements in effect on the date of approval of this application if the ap uses. | response. In add ncy's files that (1) duct; and (2) is a | lition, if concer type of | In the properties or effects of this product or an identical or data that would be required to be submitted under the data | | | |
| I certify that for each exclusive use study cited in support of the obtained the written permission of the original data submitter to cite that | | eregist | ration, that I am the original data submitter or that I have | | | |
| I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study. | | | | | | |
| I certify that in all instances where an offer of compensation is accordance with sections $3(c)(1)(F)$ and/or $3(c)(2)(B)$ of FIFRA are available evidence to the Agency upon request, I understand that the Agency may with FIFRA. | able and will be s | ubmitte | d to the Agency upon request. Should I fail to produce such | | | |
| I certify that the statements I have made on this form and knowingly false or misleading statement may be punishable by fine | | | | | | |
| Signature am M. Teller | Date May. 01, 2 | 018 | Typed or Printed Name and Title Ann M. Tillman Agent | | | |

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| | DATA N | IATRIX | | | |
|-------------------------------------|--|-------------|---------------------------------|----------------|---------------------|
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | | Page 1 of 28 |
| Applicant's/Registrant's Name & Add | | | Product | | 1 030 1 01 20 |
| | Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Consus Glufos | inate Technica | al |
| Ingredient Glufosinate-ammonius | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| Product Specific Data | | | | | |
| 830.1550 | Product Identity and Composition | 50089801 | Consus Chemicals, LLC | OWN | |
| 830.1600 | Description of Materials Used to Produce the Product | 50089801 | Consus Chemicals, LLC | OWN | |
| 830.1620 | Description of Production Process | 50089801 | Consus Chemicals, LLC | OWN | |
| 830.1650 | Description of Formulation Process | | | | Not Required |
| 830.1670 | Discussion of Formation of Impurities | 50089801 | Consus Chemicals, LLC | OWN | |
| 830.1700 | Preliminary Analysis | 50089802 | Consus Chemicals, LLC | OWN | |
| 830.1750 | Certified Limits | 50089801 | | | |
| 830.1800 | Enforcement Analytical Method | 50089804 | Consus Chemicals, LLC | OWN | |
| | | 50089803 | Consus Chemicals, LLC | OWN | |
| 830.6302 | Color | 50089805 | Consus Chemicals, LLC | OWN | |
| 330.6303 | Physical State | 50089805 | Consus Chemicals, LLC | OWN | |
| 830.6304 | Odor | 50089805 | Consus Chemicals, LLC | OWN | |
| 830.6313 | Stability to Normal and Elevated Temperatures, | 50089805 | Consus Chemicals, LLC | OWN | Data |
| | Metals, and Metal Ions | 50089806 | Consus Chemicals, LLC | OWN | Waiver ² |
| 830.6314 | Oxidation/Reduction: Chemical Incompatibility | 50089805 | Consus Chemicals, LLC | OWN | 70.70. |
| 830.6315 | Flammability | 50089806 | Consus Chemicals, LLC | OWN | Waiver ³ |
| 830.6316 | Explodability | 50089806 | Consus Chemicals, LLC | OWN | Waiver ⁴ |
| Signature | | | Name and Title | | Date |

Date

May 1, 2018

Ann M. Tillman, Agent

| | DATA N | MATRIX | | | |
|---|---|-------------|---------------------------------------|--------|---------------------------|
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | | Page 2 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | | Product Consus Glufosinate Technical | | |
| Ingredient Glufosinate-ammonius | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.6317 | Storage Stability | 50089805 | Consus Chemicals, LLC | OWN | |
| 830.6319 | Miscibility | 50089806 | | | Not Required ⁵ |
| 830.6320 | Corrosion Characteristics | 50089805 | Consus Chemicals, LLC | OWN | |
| 830.6321 | Dielectric Breakdown Voltage | 50089806 | | | Not Required ⁵ |
| 830.7000 | pH | 50089805 | Consus Chemicals, LLC | OWN | |
| 830.7050 | UV/Visible Absorption | 50089805 | Consus Chemicals, LLC | OWN | |
| 830.7100 | Viscosity | 50089806 | | | Not Required ⁵ |
| 830.7200 | Melting Point/Melting Range | 50089805 | Consus Chemicals, LLC | OWN | |
| 830.7220 | Boiling Point/Boiling Range | 50089806 | | | Not Required ⁶ |
| 830.7300 | Density/Relative Density/Bulk Density | 50089805 | Consus Chemicals, LLC | OWN | 1 |
| 830.7370 | Dissociation Constants in Water | 50089806 | Consus Chemicals, LLC | OWN/PL | |
| 830.7520 | Particle size, fiber length, diameter distribution | 50089806 | Consus Chemicals, LLC | OWN | Waiver ⁵ |
| ,30.7550 | Partition Coefficient (n-octanol/water), Shake Flask Method | 50089806 | Consus Chemicals, LLC | OWN/PL | |
| 830.7560 | Partition Coefficient (n-octanol/water), Generator Column Method | | | | See 830.7550 |
| 830.7570 | Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography | | | | See 830.7550 |
| 830.7840 | Water Solubility: Dolumn Elution Method; Shake Flask Method | 50089806 | Consus Chemicals, LLC | OWN/PL | |
| Signature | | | Name and Title | | Date |
| ann M. Jelle | | | Ann M. Tillman, Agent | | May 1, 2018 |

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| Applicant's/Registrant's Name & Add | Iress | | EPA Reg No./File Symbol 86828-L | | Page 3 of 28 |
| Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufosinate Technical | | | |
| Ingredient Glufosinate-ammonius | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 830.7860 | Water Solubility, Generator Column Method | | | | See 830.7840 |
| 830.7950 | Vapor Pressure | 50089806 | Consus Chemicals, LLC | OWN/PL | |
| 870.1100 | Acute Oral Toxicity: Rat | 50089807 | Consus Chemicals, LLC | OWN | |
| 870.1200 | Acute Dermal Toxicity: Rat | 50089808 | Consus Chemicals, LLC | OWN | |
| 870.1300 | Acute Inhalation Toxicity: Rat | 50089809 | Consus Chemicals, LLC | OWN | |
| 870.2400 | Primary Eye Irritation: Rabbit | 50089810 | Consus Chemicals, LLC | OWN | |
| 870.2500 | Primary Dermal Irritation | 50089811 | Consus Chemicals, LLC | OWN | |
| 870.2600 | Dermal Sensitization | 50089812 | Consus Chemicals, LLC | OWN | |
| Generic Data | | | | | |
| 850.2100 | Acute Avian Oral Toxicity | 00142450 00142451 | | OLD OLD | See endnote/ Not required ⁷ |
| 850.2200 | Acute Avian Dietary Toxicity | 00150988 00150989 | | OLD OLD | See endnote ⁸ |
| 850.2400 | Wild Mammal Toxicity | | | | Not required; see 870 series |
| 850.2300 | Avian Reproductive Toxicity | 40345649 40345650 | | OLD OLD | See endnote ⁹ |
| Signature | | | Name and Title | | Date |
| am M. Teller | | | Ann M. Tillman, Agent | | May 1, 2018 |

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| Date May 1, 2018 | EPA Reg No./File Symbol 86828-L | Page 4 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | Product Consus Glufosinate Tec | hnical |

Ingredient Glufosinate-ammonium (CAS No. 77182-82-2) **Guideline Reference Number Guideline Study Name MRID Number** Submitter Status Note 850.2500 Simulated or Actual Field Testing Not required 850.1075 Freshwater Fish Toxicity 00142454 OLD See endnote 10 00142455 OLD 00144338 OLD 00159913 OLD 00159914 OLD 850.1010 Freshwater Invertebrate Toxicity 00142456 OLD See endnote¹¹ 00159915 OLD 00144339 OLD 00145067 OLD 850.1025, 850.1035. Acute Toxicity Estuarine and Marine Organisms 41396104 OLD See endnote 12 350.1045, 850.1055. 41396108 OLD 850.1075 41396107 OLD 41396110 OLD 41396105 OLD 41396109 OLD 42262403 OLD 850.1300 Agriatic Invertebrate Life Cycle (Freshwater) 40501010 OLD See endnote 13 850.1350 Aquatic invertehrate Life Cycle (Saltwater)

| Signature | Name and Title | Date |
|--------------|-----------------------|-------------|
| am M. Teller | Ann M. Tillman, Agent | May 1, 2018 |

Not required 14

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| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828- | L | Page 5 of 28 |
| Applicant's/Registrant's Name & Add | Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 Consus Glufosinate Techn | | | | |
| Ingredient Glufosinate-ammonius | m (CAS No. 77182-82-2) | | • | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 850.1400 | Fish Early Life Stage (Freshwater) | | | | Not required ¹⁵ |
| 850.1400 | Fish Early Life Stage (Saltwater) | | | | Not required ¹⁶ |
| 850.1500 | Life Cycle Fish | | | | Not required 17 |
| 850.1710, 850.1730, 850.1850 | Aquatic Organisms Bioavailability, Biomagnification, Toxicity | 40501017 41323130 | | OLD OLD | See endnote ¹⁸ |
| 850.1950 | Simulated or Actual Field Testing for Aquatic Organisms | | | 0.5 | Not required |
| 850.1735 | Whole Sediment: Acute Freshwater Invertebrates | | | | Not required |
| 850.1740 | Whole Sediment: Acute Marine Invertebrates | | | | Not required |
| 850.3020 | Honey Bee Acute Contact Toxicity | 41364002 40345654 | | OLD OLD | See endnote ¹⁹ |
| 850.3030 | Honeybee Toxicity of Residues on Foliage | | | - OLD | Not required |
| 850.3040 | Field Testing for Pollinators | | | | Not required |
| 870.6100 | Delayed Neurotoxicity (Acute) – Hen | | | | Not required |
| 870.6200 | Acute Neurotoxicity – Rat | 45190703 45190704 45190701 45190702 | | OLD OLD OLD OLD | See endnote ²⁰ |
| Signature | | | Name and Title | TOLD | Date |
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| Date May 1, 2018 | EPA Reg No./File Symbol 86828-L | Page 6 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | Product Consus Glufosinate Tech | nnical |

Ingredient Glufosinate-ammonium (CAS No. 77182-82-2)

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------------------|-------------|----------------------|--------|---------------------------|
| 870.3100 | 90-Day Oral: Rodent | 45179103 | | OLD | See endnote ²¹ |
| | | 40345609 | | OLD | |
| | | 44076206 | | OLD | |
| | | 44076207 | | OLD | |
| | | 44076201 | 1 | OLD | |
| | | 44076202 | | OLD | |
| | | 44076203 | | OLD | |
| | 1. eses- | 44068501 | | OLD | |
| 870.3150 | 90-Day Oral: Non-Rodent | 40345608 | | OLD | See endnote ²² |
| | | 44068502 | | OLD | |
| 870.3200 | 21/28-Day Dermal Toxicity | 40345605 | | OLD | |
| 370.3250 | 90-Day Dermal Toxicity | | | | Not required |
| 870.3465 | 90-Day Inhalation Toxicity | 40345606 | | OLD | See endnote ²³ |
| | | 47058101 | Bayer CropScience LP | PAY | |
| 870.6100 | 28-Day Delayed Neurotoxicity Hen | | | | Not required |
| 870.6200 | 90-Day Neurotoxicity | 45179101 | | OLD | See endnote ²⁴ |
| | | 45179102 | | OLD | |
| | | 45297001 | | OLD | |

| Signature | Name and Title | Date |
|--------------|-----------------------|-------------|
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| send the form to this address. | r reducing the burden to: Director, OPPE Information Management Divis | (2101), 0.0. 2 | | cct, o.vv., vvasning | on, DC 20400. D0 110t |
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| | DATA M | ATRIX | | | |
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | | Page 7 of 28 |
| Applicant's/Registrant's Name & Add | Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufos | sinate Technica | al |
| Ingredient Glufosinate-ammoniu | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 870.4100 | Chronic Oral Rodent | 44539501 | | OLD | See endnote ²⁵ |
| | | 40345607 | | OLD | |
| | 50 | 41144701 | | OLD | |
| 870.4200 | Carcinogenicity | 44539501 | | OLD | See endnote ²⁶ |
| | | 40345607 | | OLD | |
| | | 41144701 | | OLD | |
| | | 40345609 | | OLD | |
| | | 41144702 | | OLD | |
| 870.3700 | Reproduction/Developmental Toxicity Screening | 00142445 | | OLD | See endnote ²⁷ |
| | Test | 00142446 | | OLD | 3 82 . 2 |
| | | 40345611 | | OLD | |
| | | 41144703 | | OLD | |
| | | 44076209 | | OLD | |
| | | 44076204 | | OLD | |
| | | 44076205 | | OLD | |
| | | 43829405 | | OLD | |
| 870.3800 | 2-Generation Reproduction: Rat | 40345612 | | OLD | See endnote ²⁸ |
| 870.6300 | Developmental Neurotoxicity Study | 46455701 | Bayer CropScience LP | PAY | See endnote ²⁹ |
| 870.5100 | Bacterial Reverse Mutation Test | 00142440 (AC072962) | | OLD | See endnote ³⁰ |
| Signature | | | Name and Title | | Date |
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| | DAT | TA MATRIX | | | |
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| Date May 1, 2018 | | | EPA Reg No./File Symbol 8 | 6828-L | Page 8 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufosinate Technical | | al | |
| Ingredient Glufosinate-ammoniu | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 870.5300, 830.5375 | In vitro Mammalian Cell Assay | 40345616 | | OLD | See endnote ³ |
| 870.5385, 870.5395, 870.5450, 870.5550 | In vivo Cytogenetics and Other Effects | 41144704 00142441 (AC072962) 40345614 | | OLD OLD | See endnote ³ |

| 870.5385, 870.5395, | In vivo Cytogenetics and Other Effects | 41144704 | | OLD | See endnote ³² |
|---------------------|--|------------------------|--|-----|---|
| 870.5450, 870.5550 | | 00142441 (AC072962) | | OLD | Down Half (A class) sells forestationed applicate |
| | | 40345614 | | OLD | |
| 870.7485 | Metabolism and Pharmacokinetics | 43766913 | | OLD | See endnote ³³ |
| | | 43766914 | | OLD | |
| | | 43778402 | | OLD | |
| | | 40345640 | | OLD | |
| | | 43766913 | | OLD | |
| | | 40345642 | | OLD | |
| 370.7200 | Companion Animal Safety | | | | Not required |
| 870.7600 | Dermal Penetration | 40345620 | | OLD | See endnote ³⁴ |
| | | 45922103 | Bayer CropScience LP | PAY | |
| 870.7800 | Immunotoxicity | 48491101 | Bayer CropScience LP | PAY | See endnote ³⁵ |
| 875.1100 | Dermal Exposure – Outdoor | | Agricultural Handlers Exposure Task Force | PER | See endnote ³⁶ |
| 875.1200 | De-mal Exposure – -ndoor | | | | Not required |

| Signature | Name and Title | Date |
|-------------|-----------------------|-------------|
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| e Symbol 86828-L | D. 0. (00 |
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| | Page 9 of 28 |
| Consus Glufosinate Techn | ical |
| | |

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|---|-------------|--|--------|---------------------------|
| 875.1300 | Inhalation Exposure – Outdoor | | Agricultural Handlers Exposure Task Force | PER | See endnote ³⁶ |
| 875.1400 | Inhalation Exposure - Indoor | | | | Not required |
| 875.1500 | Biological Monitoring | | Agricultural Handlers Exposure Task Force | PER | See endnote ³⁶ |
| 875.1600 | Data Reporting and Calculations | | Agricultural Handlers Exposure Task Force | PER | See endnote ³⁶ |
| 875.1700 | Product Use Information | | Agricultural Handlers Exposure Task Force | PER | See endnote ³⁶ |
| 875.2100 | Dislodgeable Foliar Residue and Turf Transferable Residues | | | GAP | See endnote ³⁷ |

| Signature | Name and Title | Date |
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| | | | | |
| | Wayne, NJ 07470 | | | |
| gredient Glufosinate-am | nmonium (CAS No. 77182-82-2) | | | |
| 75.2200 | Soil Residue Dissipation | 44802601 | OLD | |
| | • | 45005901 | OLD | |
| | | 45005902 | OLD | |
| | | 45005903 | OLD | |
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| | | 45224801 | OLD | |
| | | 45344501 | OLD | |
| | | 45432301 | OLD | |
| | | 45432302 | OLD | |
| | | | I a | |
| ignature | | | Name and Title | Date |
| am M. Tille | | | Ann M. Tilleron Annual | |
| Um 14. Juli | ~ | | Ann M. Tillman, Agent | May 1, 201 |

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| ngredient Glufosinate-amı | monium (CAS No. 77182-82-2) | | | | |
| 875.2200 | Soil Residue Dissipation (cont'd) | 45432303 45469501 45469502 45480301 45480302 45491901 45491903 45491904 45491905 45530101 45530102 45530103 45574001 45726301 45726302 46040301 46040302 46405901 46513901 | Agricultural Reentry Task Force | OLD | |
| | | 46734001 46734002 46789301 46789302 | Agricultural Reentry Task Force | PAY PAY PAY PAY | |
| Signature | | | Name and Title | | Date |
| am h. Jelle | ~ | | Ann M. Tillman, Agent | | May 1, 2018 |

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| send the form to this address. | | | | | |
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| | DA | ATA MATRIX | | | |
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | | Page 12 of 28 |
| Applicant's/Registrant's Name & Add | ress Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufosi | nate Technic | al |
| Ingredient Glufosinate-ammoniu | m (CAS No. 77182-82-2) | r | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 875.2200 | Soil Residue Dissipation (cont'd) | 48866801 | Agricultural Reentry Task Force | PAY | |
| | and the second and th | 49157401 | Agricultural Reentry Task Force | PAY | |
| | | 49157402 | Agricultural Reentry Task Force | PAY | |
| | | 49299201 | Agricultural Reentry Task Force | PAY | |
| | | 49309201 | Agricultural Reentry Task Force | PAY | |
| 875.2300 | Indoor Surface Residue Dissipation | | | | Not required |
| 875.2400 | Dermal Exposure | | | | See 875.2200 |
| 875.2500 | Inhalation Exposure | | | | See 875.2200 |
| 875.2600 | Biological Monitoring | | | | See 875.2200 |
| 875.2700 | Product Use Information | | | | See 875.2200 |
| 875.2800 | Descriptions of Human Activity | | | | See 875.2200 |
| 975.2900 | Data Reporting and Calculations | | | | See 875.2200 |
| 875.3000 | Nondietary Ingestion Exposure | | | | See 875.2200 |
| | | | | | |

| Signature | Name and Title | Date |
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| ann M. Jellen | Ann M. Tillman, Agent | May 1, 2018 |

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| DATA I | MATRIX | |
|---|----------------------------------|---------------|
| Date May 1, 2018 | EPA Reg No./File Symbol 86828-L | Page 13 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | Product Consus Glufosinate Tech | nical |

Ingredient Glufosinate-ammonium (CAS No. 77182-82-2)

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|---|-------------|-----------|--------|------|
| 201-1 | Droplet Size Spectrum | 42565901 | | OLD | |
| | • ************************************* | 42608401 | | OLD | |
| | | 42907401 | | OLD | |
| | | 43254001 | | OLD | |
| | | 43485601 | | OLD | |
| | | 43485602 | (, | OLD | |
| | | 43485603 | | OLD | |
| | | 43485604 | | OLD | |
| | | 43493801 | | OLD | |
| | | 43493802 | | OLD | |
| | | 43508001 | 1 | OLD | |
| | | 43535801 | | OLD | |
| | | 43535802 | | OLD | |
| | | 43657601 | | OLD | |
| | | 43657602 | | OLD | |
| | | 43665401 | | OLD | |
| | | 43665402 | | OLD | |
| | | 43757801 | | OLD | |
| | | 43757802 | | OLD | |
| | | 43766501 | | OLD | |
| | | 43766502 | | OLD | |
| | | 43766503 | | OLD | |
| | | 43766504 | | OLD | |

| Signature | Name and Title | Date |
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| am M. Teller | Ann M. Tillman, Agent | May 1, 2018 |

| send the form to this addre | ess. | | 3-7, | g |
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| | | DATA MATRIX | | |
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | Page 14 of 28 |
| Applicant's/Registrant's Na | consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufosinate Technic | cal |
| Ingredient Glufosinate-a | mmonium (CAS No. 77182-82-2) | | | |
| 201-1 | Droplet Size Spectrum (cont'd) | 43781101 43803501 43832102 43845501 43845901 43925701 43953002 44010201 44070001 44100901 44134101 44178701 44310401 44640801 44640901 44640901 44640901 44763001 44763001 44908901 | OLD | |
| | L | 45536001 | OLD | |
| Signature Am M. Jule | lu_ | | Name and Title Ann M. Tillman, Agent | Date May 1, 2018 |

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| | | DATA MATRIX | | | |
|-------------------------------------|--|-------------|---------------------------------|---------------------------------|-----------------------------|
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | EPA Reg No./File Symbol 86828-L | |
| Applicant's/Registrant's Name & Add | Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufos | sinate Technica | al |
| Ingredient Glufosinate-ammoniu | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 202-1 | Droplet Size Spectrum | | | | See 201-1 |
| 850.4100 | Tier 1: Seedling Emergence | 41396111 | | OLD | See endnote ³⁸ |
| | | 48531301 | Bayer CropScience LP | PAY | |
| | | 48718501 | Bayer CropScience LP | PAY | |
| 850.4150 | Tier 1: Vegetative Vigor | 41396112 | | OLD | See endnote ³⁹ |
| | | 41396113 | | OLD | |
| | | 47542602 | Bayer CropScience LP | PAY | |
| 850.4400, 850.4500 | Tier 1: Aquatic Plant Growth | 42262404 | | OLD | See endnote ⁴⁰ |
| | | 40345653 | | OLD | SA BASH SECRECATION SANGERS |
| | | 48444816 | Bayer CropScience LP | PAY | |
| | | 47542603 | Bayer CropScience LP | PAY | |
| | | 48444817 | Bayer CropScience LP | PAY | |
| 850.4100 | Tier 2: Seedling Emergence | 41396111 | | OLD | See endnote ³⁸ |
| | | 48531301 | Bayer CropScience LP | PAY | |
| | | 48718501 | Bayer CropScience LP | PAY | |
| 850.4150 | Tier 2: Vegetative Vigor | 41396112 | | OLD | See endnote ³⁹ |
| | | 41396113 | | OLD | |
| | | 47542602 | Bayer CropScience LP | PAY | |
| | | | | | |
| Signature | | | Name and Title | | Date |
| 7.77 | | | T' | | |

May 1, 2018

Ann M. Tillman, Agent

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WASHINGTON, D.C. 20460

| | | DATA MATRIX | | | |
|-------------------------------------|--|--|--|---------------------------------|---------------------------|
| Date May 1, 2018 | | St., manifested Propose, Str. 2002 Dec Francis | EPA Reg No./File Symbol 86828-L | | Page 16 of 28 |
| Applicant's/Registrant's Name & Add | Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufos | | al |
| Ingredient Glufosinate-ammonius | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 850.4400, 850.4500 | Tier 2: Aquatic Plant Growth | 42262404 40345653 48444816 47542603 48444817 | Bayer CropScience LP Bayer CropScience LP Bayer CropScience LP | OLD OLD PAY PAY PAY | See endnote40 |
| 850.4300 | Terrestrial Field | 10111011 | Dayer Gropodicrice Er | ITAI | Not required |
| 850.4450 | Aquatic Field | | | | Not required |
| 850.4025 | Target Area Phytotoxicity | | | | Not required |
| 835.2120 | Hydrolysis | 40345656 | | OLD | See endnote ⁴¹ |
| 835.2240 | Photodegradation in Water | 40345657 41323115 | | OLD OLD | See endnote ⁴² |
| 335.2410 | Photodegradation in Soil | 40345658 41920102 | | OLD OLD | See endnote ⁴³ |
| 335.2370 | Photodegradation in Air | | | | Not required |
| 835.4100 | Aerobic Soil Metabolism | 40345659 41323118 41323119 41920103 | | OLD OLD OLD | See endnote ⁴⁴ |

| Signature | Name and Title | Date |
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| am Miller | Ann M. Tillman, Agent | May 1, 2018 |

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| | | DATA MATRIX | | | The same and the s |
|---|---------------------------|---------------------------------------|---------------------------|--------|--|
| Date May 1, 2018 | | | EPA Reg No./File Symbol 8 | 6828-L | Page 17 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufosinate Technical | | al | |
| Ingredient Glufosinate-ammoniur | n (CAS No. 77182-82-2) | | <u> </u> | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 835.4200 | Anaerobic Soil Metabolism | 40501014 | | OLD | See endnote ⁴ |

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|--------------------------------|-------------|----------------------|--------|---------------------------|
| 835.4200 | Anaerobic Soil Metabolism | 40501014 | | OLD | See endnote ⁴⁵ |
| | | 41323119 | 2 | OLD | |
| | | 41920103 | | OLD | |
| | | 41323120 | | OLD | |
| 835.4300 | Aerobic Aquatic Metabolism | 40345660 | | OLD | See endnote ⁴⁶ |
| | | 45204401 | | OLD | |
| | | 45204402 | | OLD | |
| 835.4400 | Anaerobic Aquatic Metabolism | 46258601 | Bayer CropScience LP | PAY | See endnote ⁴⁷ |
| 835.1230 | Leaching/Adsorption/Desorption | 40345662 | | OLD | See endnote ⁴⁸ |
| | | 41323121 | | OLD | |
| 835.1410 | Volatility – Laboratory | 41323122 | | OLD | See endnote ⁴⁹ |
| | | 41920104 | | OLD | |
| 835.8100 | Volatility – Field | | | | Not required |

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| | DATA | MATRIX | | | |
|-------------------------------------|---|-------------|--------------------------------------|--------|---------------------------|
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | | Page 18 of 28 |
| Applicant's/Registrant's Name & Add | rant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufosinate Technica | | |
| Ingredient Glufosinate-ammoniu | ım (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 835.6100 | Soil Field Dissipation Study | 40345663 | | OLD | See endnote ⁵⁰ |
| | | 40345664 | | OLD | |
| | | 40345665 | | OLD | |
| | | 41323124 | | OLD | |
| | | 43110402 | | OLD | |
| | | 43766915 | | OLD | |
| | | 43766916 | | OLD | |
| 835.6200 | Aquatic Sediment Field Dissipation Study | 45204403 | | OLD | See endnote ⁵¹ |
| 835.6300 | Forest Field Dissipation Study | | | | Not required |
| 835.6400 | Combination and Tank Mixes | | | | Not required |
| 835.7100 | Ground Water Monitoring | | | | Not required |
| 350.6100 | Environmental Chemistry Methods | 40345666 | | OLD | See endnote ⁵² |
| | | 41323123 | | OLD | |
| | | 41920106 | | OLD | 1 |
| | | 43766915 | | OLD | |
| | | 47542606 | Bayer CropScience LP | PAY | |
| | | 47542607 | Bayer CropScience LP | PAY | |
| | · | 49055301 | Bayer CropScience LP | PAY | l'i |
| | L | | | | |
| Signature | | | Name and Title | | Date |

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May 1, 2018

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| DATA | MATRIX | |
|---|----------------------------------|---------------|
| Date May 1, 2018 | EPA Reg No./File Symbol 86828-L | Page 19 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | Product Consus Glufosinate Tech | nnical |

Ingredient Glufosinate-ammonium (CAS No. 77182-82-2)

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|----------------------------------|-------------|-----------|--------|------|
| 860.1300 | Nature of the Residue: Plants | 40501001 | | OLD | |
| | | 40501002 | | OLD | |
| | | 41323109 | | OLD | |
| | | 41323129 | | OLD | |
| | | 41323107 | | OLD | |
| | | 43515602 | | OLD | |
| | | 43515603 | | OLD | |
| | | 44358601 | | OLD | |
| | | 44358605 | | OLD | |
| | | 44358606 | | OLD | |
| | | 44358607 | | OLD | |
| 360.1300 | Nature of the Residue: Livestock | 40345645 | | OLD | |
| | | 40345646 | | OLD | |
| | | 43766918 | | OLD | |
| | | 43766919 | | OLD | |
| | | 41323110 | | OLD | |

| Signature | Name and Title | Date |
|--------------|-----------------------|-------------|
| am M. Teller | Ann M. Tillman, Agent | May 1, 2018 |

| | | DATA MATRIX | | | |
|-------------------------------------|--|-------------|---------------------------------|-------------------|---------------|
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | | Page 20 of 28 |
| Applicant's/Registrant's Name & Ado | Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glui | fosinate Technica | al |
| Ingredient Glufosinate-ammoniu | m (CAS No. 77182-82-2) | | • | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 860.1850 | Confined Rotational Crops | 00142471 | | OLD | |
| | | 00157818 | | OLD | |
| | | 40501015 | | OLD | |
| | | 41323125 | | OLD | |
| | | 41323126 | | OLD | |
| | | 41920105 | | OLD | |
| | | 43766917 | | OLD | |
| 860.1340 Residue Analyti | Residue Analytical Methods | 40345666 | | OLD | |
| | | 41095802 | | OLD | |
| | | 41323113 | | OLD | |
| | | 42121905 | | OLD | |
| | | 42523602 | | OLD | |
| | | 42523603 | | OLD | |
| | | 43515604 | | OLD | |
| | | 43524601 | | OLD | |
| | | 43612302 | | OLD | |
| | | 44903201 | | OLD | |
| | | 44973001 | | OLD | |
| | | 45137001 | | OLD | |
| | | 47828203 | IR-4 | PL | |
| Signature | | | Name and Title | | Date |
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| | DATA N | IATRIX | | | |
|---|---|-------------|---------------------------------------|--------|---------------|
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | | Page 21 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | | Product Consus Glufosinate Technical | | al |
| ngredient Glufosinate-ammoniu | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 860.1360 | Multiresidue Method | 43515605 | | OLD | |
| | | 43766920 | | OLD | |
| 860.1380 | Storage Stability | 44827901 | | OLD | |
| | | 45782201 | Bayer CropScience LP | PAY | |
| | | 48201502 | Bayer CropScience LP | PAY | |
| 860.1500 | Magnitude of the Residue in Plants: bananas | 42121901 | | OLD | |
| | | 42121902 | | OLD | |
| | | 42121903 | | OLD | |
| | | 42121904 | | OLD | |
| 860.1500 | Magnitude of the Residue in Plants: berry crop | 45580201 | | OLD | |
| | subgroup 13B, including salal | 47035701 | Bayer CropScience LP | PAY | |
| 360.1500 | Magnitude of the Residue in Plants: canola | 44358605 | | OLD | |
| | | 44358608 | | OLD | |
| | | 44358609 | 1 | OLD | |
| | | 44358610 | | OLD | |
| | | 48976701 | Bayer Crop Science LP | PAY | |
| | | 48976702 | Bayer Crop Science LP | PAY | |
| | | 48976703 | Bayer Crop Science LP | PAY | |
| 860.1500 | Magnitude of the Residue in Plants: citrus crop group 10-10 | 47915701 | Bayer Crop Science LP | PAY | |
| Signature | | | Name and Title | | Date |
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| DATA | MATRIX | |
|---|----------------------------------|---------------|
| Date May 1, 2018 | EPA Reg No./File Symbol 86828-L | Page 22 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | Product Consus Glufosinate Tech | nical |

Ingredient Glufosinate-ammonium (CAS No. 77182-82-2)

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|---|-------------|----------------------|--------|------|
| 860.1500 | Magnitude of the Residue in Plants: corn (field | 40501004 | | OLD | |
| | and sweet) | 43515606 | | OLD | |
| | | 43515608 | | OLD | |
| | | 43766923 | | OLD | |
| | | 43766926 | | OLD | |
| | | 44033302 | k n | OLD | |
| | | 44425201 | | OLD | |
| | | 44425202 | | OLD | |
| | | 47828201 | IR-4 | PL | |
| | | 47828202 | IR-4 | PL | |
| | | 49963402 | Bayer CropScience LP | PAY | |
| 360.1500 | Magnitude of the Residue in Plants: cotton | 45089301 | | OLD | |
| | | 45089302 | | OLD | |
| | | 45089303 | | OLD | |
| 860.1500 | Magnitude of the Residue in Plants: grapes | 40501007 | | | |
| 860.1500 | Magnitude of the Residue in Plants: olives | 47915704 | Bayer CropScience LP | PAY | |
| 860.1500 | Magnitude of the Residue in Plants: pome fruit | 40501006 | | OLD | |
| | crop group 11-10 | 47915702 | Bayer CropScience LP | PAY | |

| Signature | Name and Title | Date |
|---------------|-----------------------|-------------|
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| No./File Symbol 86828-L | Page 23 of 28 | |
|---------------------------------------|------------------------------|--|
| | | |
| Product Consus Glufosinate Technical | | |
| | Consus Giulosinale Technical | |

| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
|----------------------------|---|-------------|----------------------|--------|------|
| 860.1500 | Magnitude of the Residue in Plants: soybeans | 40501003 | | OLD | |
| | | 43515607 | 1 | OLD | |
| | | 43515609 | | OLD | |
| | | 43766924 | | OLD | |
| | | 43766925 | 1 | OLD | |
| | | 48205501 | Bayer CropScience LP | PAY | |
| | | 49963401 | Bayer CropScience LP | PAY | |
| 860.1500 | Magnitude of the Residue in Plants: stone fruit crop group 12-12 | 47915703 | Bayer CropScience LP | PAY | |
| 860.1500 | Magnitude of the Residue in Plants: sugar beets | 44358602 | | OLD | |
| | 55,009 miles | 44358603 | | OLD | |
| | | 44358604 | | OLD | |
| 860.1500 | Magnitude of the Residue in Plants: tree nut crop group 14 (including pistachios) | 40501005 | | OLD | |
| | | 49974601 | Bayer CropScience LP | PAY | |
| 860.1500 | Magnitude of the Residue in Plants: potatoes (vine desiccation) | 44358611 | | OLD | |
| | | 44358612 | 1 | OLD | |
| | | 44583901 | | OLD | |
| 860.1520 | Magnitude of the Residue in Processed Food or | 44358610 | | OLD | |
| | Fead: canola | 48976702 | Bayer CropScience LP | PAY | |

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|--------------|-----------------------|-------------|
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| | DATA M | ATRIX | | | |
|---|---|---------------------------------------|-----------------------|---------------|-------------|
| Date May 1, 2018 | | EPA Reg No./File Symbol 86828-L | | Page 24 of 28 | |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | Product Consus Glufosinate Technical | | | |
| Ingredient Glufosinate-ammoniu | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 860.1520 | Magnitude of the Residue in Processed Food or Feed: citrus | 47915706 | Bayer CropScience LP | PAY | |
| 860.1520 | Magnitude of the Residue in Processed Food or | 40501004 | | OLD | |
| | Feed: corn | 43515608 | | OLD | |
| | | 43766926 | | OLD | |
| | | 44033302 | | OLD | |
| 860.1520 | Magnitude of the Residue in Processed Food or Feed: cotton | 45089302 | | OLD | |
| 860.1520 | Magnitude of the Residue in Processed Food or Feed: grapes | 40501007 | | OLD | |
| 860.1520 | Magnitude of the Residue in Processed Food or Feed: olives | 47915708 | Bayer CropScience LP | PAY | |
| 360.1520 | Magnitude of the Residue in Processed Food or Feed: pome fruits | 40501006 | | OLD | |
| 860.1520 | Magnitude of the Residue in Processed Food or Feed: soybeans | 40501003 | | OLD | |
| | | 43515609 | | OLD | |
| | | 43766927 | | OLD | |
| 860.1520 | Magnitude of the Residue in Processed Food or | 47915707 | Bayer CropScience LP | PAY | |
| | Feed: stone fruits | 47915705 | Bayer CropScience LP | PAY | |
| 860.1520 | Magnitude of the Residue in Processed Food or Feed, sugar beets | 44358604 | | OLD | |
| Signature | | | Name and Title | · | Date |
| am M. Jeller | | | Ann M. Tillman, Agent | | May 1, 2018 |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

| | DATA MA | ATRIX | | | |
|---|---|-------------|---------------------------------------|--------|---------------|
| Date May 1, 2018 | | | EPA Reg No./File Symbol 86828-L | | Page 25 of 28 |
| Applicant's/Registrant's Name & Address Consus Chemicals, LLC 22 Pine Tree Drive Wayne, NJ 07470 | | | Product Consus Glufosinate Technical | | |
| Ingredient Glufosinate-ammonius | m (CAS No. 77182-82-2) | | | | |
| Guideline Reference Number | Guideline Study Name | MRID Number | Submitter | Status | Note |
| 860.1520 | Magnitude of the Residue in Processed Food or Feed: potatoes | 44358612 | | OLD | |
| 860.1480 | Magnitude of the Residue in Meat, Milk, Poultry, | 41323111 | | OLD | |
| | and Eggs | 41323112 | | OLD | |
| | | 43766921 | | OLD | |
| | | 43766922 | | OLD | |
| 860.1400 | Nature and Magnitude of the Residue in Potable Water | | | | Not required |
| 860.1400 | Magnitude of the Residue in Fish | | | | Not required |
| 860.1400 | Magnitude of the Residue in Plants Resulting from the Use of Irrigation Water | | | | Not required |
| 860.1460 | Magnitude of the Residue in Food Handling Establishments | | | | Not required |
| 860.1900 | Field Rotational Crops | 40501015 | | OLD | |
| | | 40501016 | | OLD | |
| | | 41323127 | | OLD | |
| | | 41323128 | | OLD | |
| | | 45644901 | | OLD | |
| | | 46573701 | Bayer CropScience LP | PAY | |

Endnotes for Consus Glufosinate Technical Data Matrix

- ¹ **830.1650** These data are not required for the registration of a manufacturing use product. See 830.1620 for production process information.
- ² 830.6313 Consus Chemicals, LLC is requesting a waiver from the stability to metal and metal ions. Consus Glufosinate Technical is not packaged or stored in contact with metals or metal ions. Data for stability was generated and is reported in MRID 50089805.
- ³ 830.6315 Consus Chemicals, LLC requests a waiver from this data requirement because glufosinate-ammonium is a solid and is not expected to be flammable.
- 4 830.6316 Consus Chemicals, LLC requests a waiver from this data requirement because glufosinate-ammonium does not have the chemical bonds or functional groups associated with explosive chemicals.
- ⁵ 830.6319, 830.6321, 830.7100, 830.7520 Consus Glufosinate Technical is a solid and not an emulsifiable concentrate and is not to be diluted with petroleum solvents. Therefore, miscibility data are not required for this technical. Consus Glufosinate Technical is not to be used around electrical equipment and data for dielectric breakdown constant are not required. Consus Glufosinate Technical is a solid and not a liquid, therefore, viscosity data are not required for this product. Consus Chemicals, LLC requests a waiver for particle size, fiber length and diameter distribution because Consus Glufosinate Technical is not water insoluble nor is it a fibrous material.
- ⁶ **830.7220** Consus Glufosinate Technical is a solid and boiling point data are not required for solids. Data for melting point are required for solids. See Guideline 830.7200.
- ⁷ 850.2100 The studies cited are acceptable and satisfy the data requirement as per the Sept. 12, 2014 Environmental Fate and Ecological Risk Assessment for the Registration Review of Glufosinate (EFED RA). The EFED RA states that passerine data have not been submitted, nor were data required in the Registration Review DCI.
- 8 850.2200 The studies cited are acceptable and satisfy the data requirement as per the EFED RA.
- ⁹ 850.2300 The studies cited are acceptable and satisfy the data requirement as per the EFED RA. More recently submitted bobwhite quail data are not cited as these data are duplicative of data that satisfy the data requirement and were not called-in by EPA in the Registration Review DCI.
- 10 850.1075 The studies cited are acceptable or supplemental and satisfy the data requirement as per the EFED RA. More recently submitted rainbow trout data are not cited as these data are duplicative of data that satisfy the data requirement and were not called-in by EPA in the Registration Review DCI.
- 11 850.1010 The studies cited are acceptable or supplemental and satisfy the data requirement as per the EFED RA. More recently submitted daphnia data are not cited as these data are duplicative of data that satisfy the data requirement and were not called-in by EPA in the Registration Review DCI.
- ¹² **850.1025**, **850.1035**, **850.1045**, **850.1055**, **850.1075** The studies cited are acceptable or supplemental and satisfy the data requirement as per the EFED RA.
- 13 850.1300 The study cited is acceptable and satisfies the data requirement as per the EFED RA. More recently submitted daphnia data are not cited as these data are duplicative of data that satisfy the data requirement and were not called-in by EPA in the Registration Review DCI.
- 14 850.1350 The EFED RA states that these data have not been submitted nor are required for Registration Review.
- 15 850.1400 The EFED RA states that these data have not been submitted nor are required for Registration Review.
- 16 850.1400 The EFED RA states that these data have not been submitted nor are required for Registration Review.
- 17 850.1500 The EFED RA states that these data have not been submitted nor are required for Registration Review.
- ¹⁸ **850.1710**, **850.1730**, **850.1850** The studies cited are acceptable or supplemental and satisfy the data requirement as per the EFED RA.

Endnotes for Consus Glufosinate Technical Data Matrix

- 19 850.3020 The studies cited are acceptable and satisfy the data requirement as per the EFED RA. Note: the June 2016 Glufosinate Ammonium Proposed Interim Registration Review Decision (Interim Decision) noted that pollinator data were considered a data gap and would be called-in at a later date. Since the DCI has not been issued, these data requirements are not currently identified as a data gap. Note: MRID 41364002 does not appear to be conducted on a relevant chemical.
- 20 870.6200 The studies cited are acceptable and satisfy the data requirement as per the July 25, 2012 Glufosinate Ammonium Updated Human Health Risk Assessment for the Proposed New Use of Glufosinate Ammonium in/on Citrus Fruit (Crop Group 10), Pome Fruit (Crop Group 11), Stone Fruit (Crop Group 12), Olives and Sweet Corn (DP Barcode D387413) (2012 Human Health RA).
- ²¹ **870.3100** The studies cited are acceptable and satisfy the data requirement as per the 2012 Human Health RA.
- ²² **870.3150** The study cited is acceptable and satisfies the data requirement as per the 2012 Human Health RA. Note: chronic data were used to satisfy subchronic data requirements.
- ²³ **870.3465** The studies cited are supplemental or acceptable and satisfy the data requirement as per the 2012 Human Health RA.
- ²⁴ **870.6200** The studies cited are acceptable and satisfy the data requirement as per the 2012 Human Health RA. Unacceptable data were not cited.
- ²⁵ **870.4100** The studies cited are acceptable and satisfy the data requirement as per the 2012 Human Health RA.
- ²⁶ **870.4200** The studies cited are acceptable and satisfy the data requirement as per the 2012 Human Health RA.
- ²⁷ **870.3700** The studies cited are acceptable and satisfy the data requirement as per the 2012 Human Health RA. Unacceptable data were not cited.
- ²⁸ **870.3800** The study cited is acceptable and satisfies the data requirement as per the 2012 Human Health RA.
- ²⁹ **870.6300** The study cited is acceptable and satisfies the data requirement as per the 2012 Human Health RA.
- ³⁰ **870.5100** The study cited is acceptable and satisfies the data requirement as per the 2012 Human Health RA.
- 31 870.5300, 830.5375 The study cited is acceptable and satisfies the data requirement as per the 2012 Human Health RA. Note: MRID 40345616 was incorrectly cited as 40445616. The correct study is cited here.
- ³² **870.5385**, **870.5395**, **870.5450**, **870.5550** The studies cited are acceptable and satisfy the data requirement as per the 2012 Human Health RA.
- ³³ **870.7485** The studies cited are acceptable and satisfy the data requirement as per the 2012 Human Health RA.
- 870.7600 The studies cited are acceptable and satisfy the data requirement as per the 2012 Human Health RA. Recent, voluntarily submitted data ("triple pack" data) were not cited as these data were not required in the DCI and EPA stated in the Oct. 29, 2013 Glufosinate Ammonium Response to Comments on the Human Health Risk Assessment for Registration Review (HED Response to Comments) that these data would not be utilized to further refine human dermal risk assessments.
- 35 870.7800 The study cited is acceptable and satisfies the data requirement as per the 2012 Human Health RA (Note: study was not referenced by MRID number but was referenced by subject).
- ³⁶ 875.1100, 875.1300, 875.1500, 875.1600, 875.1700 Consus Chemicals, LLC is a "Participating Company" in good standing with the Agricultural Handlers Exposure Task Force (AHETF). Data submitted by the AHETF satisfy this data requirement. A letter of authorization for reliance on AHETF data can be provided upon request.

Endnotes for Consus Glufosinate Technical Data Matrix

- ³⁷ 875.2100 The Jan. 24, 2013 Glufosinate Ammonium Human Health Risk Assessment for Registration Review (DP Barcode D406360) (2013 Human Health RA) and the HED Response to Comments identify these data as a data gap based on the 2012 Exposure Science Advisory Council Guidance Document. It appears that these data have not been called-in, nor have they been submitted, and is currently considered a data gap.
- ³⁸ **850.4100** Although the studies cited are supplemental, they appear to have been used in the risk assessment and no additional data will be required as per the EFED RA.
- ³⁹ **850.4150** Although many of the studies cited are supplemental, they appear to have been used in the risk assessment and no additional data will be required as per the EFED RA.
- 40 850.4400, 850.4500 Although the studies cited are supplemental, they appear to have been used in the risk assessment and no additional data will be required as per the EFED RA. More recently submitted algal toxicity data are not cited as these data are duplicative of data that satisfy the data requirement, conducted with a test material not required by EPA, or were not called-in by EPA in the Registration Review DCI.
- ⁴¹ 835.2120 The study cited is acceptable and satisfies the data requirement as per the EFED RA.
- ⁴² **835.2240** The studies cited are supplemental or acceptable and satisfy the data requirement as per the EFED RA.
- ⁴³ **835.2410** The studies cited are supplemental or acceptable and satisfy the data requirement as per the EFED RA. Unacceptable data were not cited.
- ⁴⁴ **835.4100** The studies cited are supplemental or acceptable and satisfy the data requirement as per the EFED RA. Unacceptable data were not cited.
- ⁴⁵ **835.4200** The studies cited are supplemental or acceptable and satisfy the data requirement as per the EFED RA.
- ⁴⁶ **835.4300** The studies cited are supplemental or acceptable and satisfy the data requirement as per the EFED RA.
- ⁴⁷ **835.4400** The study cited are supplemental but satisfies the data requirement as per the EFED RA. Unacceptable data were not cited.
- ⁴⁸ **835.1230** The studies cited are supplemental or acceptable and satisfy the data requirement as per the EFED RA. Unacceptable data were not cited.
- ⁴⁹ 835.1410 The studies cited are acceptable and satisfy the data requirement as per the EFED RA.
- 50 835.6100 The studies cited are supplemental or acceptable and satisfy the data requirement as per the EFED RA. Unacceptable or upgradable data were not cited. In addition, more recently submitted dissipation toxicity data are not cited as these data are duplicative of data that satisfy the data requirement and were not called-in by EPA in the Registration Review DCI.
- 51 835.6200 Although the study cited was classified as upgradable, it appears that a new study will not be required as per the EFED RA.
- ⁵² **850.6100** The EFED RA indicates that the cited studies are acceptable with the submission of an ILV study. This study appears to have been submitted under 49055301 and is cited herein.